

STATEMENT OF BASIS (AI No. 38548)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0117960 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Meek Seafood, Inc.
Post Office Box 1367
Larose, Louisiana 70373

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: June 2, 2009

1. PERMIT STATUS**A. Reason For Permit Action:**

Issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permits – LA0117960
LPDES permit effective date: February 1, 2004
LPDES permit expiration date: January 31, 2009

C. Date Application Received: April 23, 2009

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - crab processing facility**

Meek Seafood, Inc. is an existing crab processing facility. The facility receives live crabs and boils them. The crabmeat is then picked and packed for shipment. Crabs are processed all year long with the peak season from May to September.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II *
3. Wastewater Type: II
4. SIC code: 2092

*SIC Code 2092 has a complexity type of II with a corresponding 10 points. The points have been BPJ'ed to 0 to be consistent with other seafood processors.

C. LOCATION - 105 E Avenue I Delta Farm Road, Larose, Lafourche Parish
Latitude 29° 34' 49", Longitude 90° 22' 39"

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3. **OUTFALL INFORMATION**

Outfall 001

Discharge Type: crab boil water, equipment and floor washdown water, and treated sanitary wastewater
Treatment: sewage treatment plant with chlorination for treated sanitary wastewater; all wastewaters combine in a tank then discharges through a pipe
Location: at the point of discharge from the catch tank located at the northwest corner of the facility
Flow: 625 gpd
Discharge Route: effluent pipe thence to the Intracoastal Waterway

4. **RECEIVING WATERS**

STREAM - effluent pipe thence to the Intracoastal Waterway

BASIN AND SEGMENT - Barataria Basin, Segment 020801

DESIGNATED USES -
a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. **TMDL STATUS**

Subsegment 020801 is not listed on LDEQ's Final 2006 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. **PROPOSED EFFLUENT LIMITS**

BASIS - See Rationale below.

Changes from previous permit:

The monitoring frequency for Outfall 001 is being increased from quarterly to monthly and the fecal coliform limit has been updated in accordance with the reissuance of the Class I Sanitary Discharge General Permit.

7. **COMPLIANCE HISTORY/COMMENTS**

There were no recent inspections at the facility.

One DMR was submitted for the first quarter of 2009. No other DMR's have been submitted for the last two years. There were no excursions found on the 2009 DMR.

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8. EXISTING EFFLUENT LIMITS

Outfall 001 – crab boil water (no seasonings used), crabmeat picking washdown water, cooler room cleaning water, and treated sanitary wastewater

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow	Report 1/quarter Est.	Report 1/quarter Est.
BOD ₅	0.37 lbs/day 1/quarter Grab	0.68 lbs/day 1/quarter Grab
TSS	0.87 lbs/day 1/quarter Grab	1.68 lbs/day 1/quarter Grab
Oil & Grease	0.1 lbs/day 1/quarter Grab	0.21 lbs/day 1/quarter Grab
Fecal Coliform	200 col/100 mL 1/quarter Grab	400 col/100 mL 1/quarter Grab
pH	6.0-9.0 s.u. 1/quarter Grab	

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020801 of the Barataria Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008, from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

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11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for Meek Seafood, Inc.

1. **Outfall 001** - crab boil water, equipment and floor washdown water, and treated sanitary wastewater (estimated flow is 625 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	lbs/day		
Flow	Report	Report	*
BOD ₅	0.37	0.68	40CFR408.25, Subpart B; *
TSS	0.87	1.68	40CFR408.25, Subpart B; *
Oil & Grease	0.10	0.21	40CFR408.25, Subpart B; *
Fecal Coliform	200 col/100 mL	400 col/100 mL	LAG530000, Schedule B; *
pH	6.0 s.u.	9.0 s.u.	40CFR408.25, Subpart B; *

Treatment: sewage treatment plant with chlorination for treated sanitary wastewater; all wastewaters combine in a tank then discharge through a pipe

Monitoring Frequency: monthly for all parameters at the point of discharge from the effluent pipe. The monitoring frequency is being increased from quarterly to monthly due to the lack of DMR's submitted for this outfall.

Limits Justification: New Source guidelines for conventional blue crab processing (40 CFR 408.25, Subpart B) apply since the facility started operations October 27, 1987, which is after the promulgation of these guidelines. In addition, the facility will be granted additional BOD and TSS loadings to account for the treated sanitary wastewater that is commingled with the process water. The additional loadings are calculated using the secondary treatment concentrations as per LAC33:IX.2645 and added to the guideline loadings. Fecal Coliform limits are based on LAG530000, Schedule B.

Effluent guideline:

40 CFR 408.25- Subpart B (Conventional Blue Crab Processing Subcategory)

Monthly Avg. BOD = (1,667 pounds/day) X (0.15 pounds/1000 pounds) = 0.25 lbs/day

Daily Max. BOD = (1,667 pounds/day) X (0.30 pounds/1000 pounds) = 0.50 lbs/day

Monthly Avg. TSS = (1,667 pounds/day) X (0.45 pounds/1000 pounds) = 0.75 lbs/day

Daily Max. TSS = (1,667 pounds/day) X (0.90 pounds/1000 pounds) = 1.50 lbs/day

Monthly Avg. Oil & Grease = (1,667 pounds/day) X (0.065 pounds/1000 pounds) = 0.10 lbs/day

Daily Max. Oil & Grease = (1,667 pounds/day) X (0.13 pounds/1000 pounds) = 0.21 lbs/day

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Additional Loadings for Treated Sanitary Wastewater based on LAC33:IX.2645:

Flow: 25 Employees (max) X 20 GPD = 500 GPD

Monthly Avg. BOD = 0.000500 MGD X [8.34 (lb/MG)/(mg/l)] X 30 mg/l = 0.12 lbs/day

Daily Max. BOD = 0.000500 MGD X [8.34 (lb/MG)/(mg/l)] X 45 mg/l = 0.18 lbs/day

Monthly Avg. TSS = 0.000500 MGD X [8.34 (lb/MG)/(mg/l)] X 30 mg/l = 0.12 lbs/day

Daily Max. TSS = 0.000500 MGD X [8.34 (lb/MG)/(mg/l)] X 45 mg/l = 0.18 lbs/day

Final Limitations for BOD and TSS

Monthly Avg. BOD = 0.25 lbs/day(guidelines) + 0.12 lbs/day (sanitary) = 0.37 lbs/day

Daily Max. BOD = 0.50 lbs/day(guidelines) + 0.18 lbs/day (sanitary) = 0.68 lbs/day

Monthly Avg. TSS = 0.75 lbs/day(guidelines) + 0.12 lbs/day (sanitary) = 0.87 lbs/day

Daily Max. TSS = 1.50 lbs/day(guidelines) + 0.18 lbs/day (sanitary) = 1.68 lbs/day

* Previous permit
 BPJ Best Professional Judgement
 su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 2092 are considered to have storm water discharges associated with industrial activity.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).